

February 27, 2014

Senate Regulatory Reform Committee  
Farnum Building, Room 210  
125 W Allegan Street  
Lansing, MI 48933

Good Morning Honorable Committee Members,

My name is Matthew Oddy, I represent over 550 Checker Cab owners and operators in Detroit. I also own and operate a limousine licensed under the State Limousine Act.

As a representative of Checker Cab and limousine owner with over 15 years transportation experience I have first hand knowledge of the local and state regulations that protect citizens and promote safe, efficient, and competitive transportation.

In 1994, Detroit, the State's largest transportation market, amended its Vehicle for Hire Taxi Ordinance to include Class B limousine oversight. The State of Michigan recognized the City's need to maintain this local oversight and in 2000 passed HB5812 making local oversight a part of the State Limousine Act 271 of 1990.

I strongly support SB748 which simply lowers the population threshold in the current State Limousine Act from 750,000 to 500,000 and adjusts the definition of a class B limousine. These adjustments to the current Law would maintain local oversight of Class B limousines **which are essentially taxis and other vehicles which operate as unmetered taxis such as black cars and mini-vans in Detroit.**

MDOT has reviewed the bill and recommended a minor change to the definition of a Class B limousine which I also support. MDOT would like to see the passenger count to be set at less than 9 passengers including the driver. This change would be consistent with Federal guidelines that impose stricter regulation on vehicles that carry 9 to 15 passengers including the driver

The issue of limousines operating as "Taxis" avoiding local oversight is not just a Detroit phenomenon. Seattle Washington and Philadelphia Pennsylvania recently added ordinances to regulate the limousine industry.

They determined that these vehicles are essentially "Taxi" operators and were avoiding local oversight by licensing the vehicle as a Limousine but operating the vehicle as a "Taxis" on the street. **I have included the articles for your review.**

Since the population level in Detroit dropped last year below the 750,000 threshold, there has been a flood of "Taxi" operators using this loophole. These 5 to 8 passenger's mini-vans, sedans and SUV's look and operate as tradition taxis on the streets of Detroit but avoid local oversight which provides basic consumer protection for tourists and citizen's. **I have provided a few pictures for reference.**

These operators have not passed a criminal background check, not secured a City of Detroit public vehicle license, have not passed local safety inspections, and are not required to charge a consistent rate or an advertised trip rate.

Local Vehicle for Hire oversight, which the State is unable to provide, is necessary to keep the citizens and visitors of the State of Michigan safe and foster a competitive business environment. This loophole has left citizens and visitors without basic consumer protections for long enough.

**Again, I am strongly in support of SB 748 to maintain needed local oversight in the States largest transportation market.**

**In closing, this bill is about consumer protection, public safety and a level competitive playing field. Because the State does not have the resources to adequately enforce the State law at the local level, the City should be permitted to continue the enforcement of the local ordinance as they have for nearly 20 years.**

**Thank you for the opportunity to participate in the legislative process and address the Senate Regulatory Reform Committee.**

Sincerely,

Matthew Oddy  
Checker Cab Company

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## PPA BOARD APPROVES TAXI & LIMO REGULATIONS

### Board acts after reviewing thousands of pages of public comment

(PHILADELPHIA) – The Board of the Philadelphia Parking Authority (PPA) today approved taxicab and limousine regulations to assure stability in the industry and support the development of clean, safe, reliable and well-regulated taxis and limousines in Philadelphia.

The PPA was required to propose regulations and elicit public comment, which ended on February 14, 2011. PPA board members and staff spent countless hours painstakingly reviewing thousands of pages of comments from cab drivers and other industry representatives, as well as state legislators and members of the general public.

Based on a review of the thousands of pages of public comment, the PPA plans further review of its taxi and limo regulations with a goal towards creating an even better system of safety, reliability and convenience.

The regulations will be effective once they are published in the Pennsylvania Bulletin.

Commenting on the Board's approval of the regulations, PPA Executive Director Vince Fenerty said, "In adopting these regulations, our aim is to insure public safety and maintain stability in the industry." The PPA initiated regulatory oversight of taxicab and limousine service providers in Philadelphia in April 2005.

"Rules and regulations are needed to provide certainty to the general public and the taxi and limo industry. A lack of regulations would create uncertainty as to what rules, rates and procedures apply to taxicab and limousine service in Philadelphia," Fenerty said.

Because of pending court appeals of existing regulations, several taxicab and limousine companies have already refused to submit their vehicles for inspection, are providing service with drivers that have not been certified, and have refused to pay annual fees.

"The public's health, safety and welfare are endangered through the use of uninspected vehicles and uncertified drivers," Fenerty said.

"The regulations are aimed at maintaining the practices and procedures applicable to the taxicab and limousine industry in Philadelphia since 2005. They are intended to support the development of clean, safe, reliable and well-regulated taxicabs and limousines. They are also intended to be clear, feasible and reasonable," Fenerty said.

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## INDEPENDENT REGULATORY REVIEW COMMISSION

333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

October 6, 2011

Vincent J. Fenerty, Jr., Executive Director  
Philadelphia Parking Authority  
3101 Market Street  
Philadelphia, PA 19104-2895

Re: Regulation #126-1 (IRRC #2885)  
Philadelphia Parking Authority  
Philadelphia Taxicab and Limousine Regulations

Dear Mr. Fenerty:

The Independent Regulatory Review Commission approved the subject regulation today. Our order is enclosed and will be available on our website at [www.lrrc.state.pa.us](http://www.lrrc.state.pa.us).

We appreciate the joint effort that went into producing a regulation that meets the criteria and intent of the Regulatory Review Act.

Sincerely,

Silvan B. Lutkewitte, III  
Chairman

sfh

Enclosure

cc: Honorable Robert M. Tomlinson, Majority Chairman, Senate Consumer Protection and Professional Licensure Committee  
Honorable Lisa M. Boscola, Minority Chairman, Senate Consumer Protection and Professional Licensure Committee  
Honorable Chris Ross, Majority Chairman, House Urban Affairs Committee  
Honorable W. Curtis Thomas, Minority Chairman, House Urban Affairs Committee

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### SB 5502: To Allow Enforcement Authority Over Seattle Limousine Companies

by admin on May 12, 2011

The Legislature of the State of Washington recently enacted Senate Bill 5502 which will allow the city to regulate Seattle limousine companies jointly with the state Department of Licensing (DOL). The DOL is responsible for the regulation of all limousine companies within the state.

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SB 5502 will allow the Seattle Consumer Affairs Office to regulate all limousine companies which operate within city limits. The newly enacted legislation will also create new civil penalties for drivers which operate vehicles without a required permit.

Approximately 80% of the state's licensed limousine companies operate within the Seattle area. Prior to SB 5502, the city had no authority to enforce state regulations. Due to lack of manpower and financial resources the Washington DOL was unable to provide consistent enforcement of limousine companies operating in the state.

License fees will also increase for all operators in order to help pay for hiring additional staff. The new limousine regulations will take effect on January 1, 2012.

#### Recent Seattle Ground Transportation News

[Seattle Seeks Enforcement Authority For Limousine Services](#)

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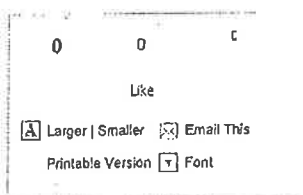
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## Bill would let Seattle enforce limo regulations

City wants authority to crack down on rogue operators

By SCOTT GUTIERREZ, SEATTLEPI.COM STAFF  
Updated 10:00 p.m., Tuesday, March 2, 2010



State lawmakers inched one step closer this week to granting the city of Seattle long-sought authority to crack down on for-hire town car drivers who illegally operate without licenses or insurance and put consumers at risk.

For years, a growing number of fancy, for-hire Lincoln Town Cars have been operated illegally on Seattle streets, taking business from taxis and legitimate limo companies

who follow the law, city officials say. But the city's taxi regulators have been unable to take action against town cars because the state Department of Licensing has jurisdiction. The state, however, does not have enough people or money to consistently investigate violations on city streets.

On Monday, the Senate Transportation Committee voted 9-3 to approve Engrossed Substitute House Bill 1775, which would allow Seattle's Consumer Affairs office to assume the same enforcement authority over town cars and limousines that it wields over the taxi industry.

"This issue is all about enforcement. DOL does not have the resources to provide on-street enforcement. This has created a serious problem in downtown Seattle where illegal limousines operate all day, every day," said Denise Movius, Seattle's director of Revenue and Consumer Affairs division, during Monday's committee hearing.

The bill already passed the state House of Representatives last month and now heads to the Senate Rules Committee, where lawmakers must decide whether it should get a full vote on the Senate floor. The legislative session ends March 11.

The legislation, introduced by state Rep. Scott White, D-Seattle, is supported by Seattle taxi drivers and the Puget Sound Limo Association, which worked with legislators on the issue. By transferring regulatory authority from the state to the city, there likely would be better consumer protections and stronger enforcement against violations by town car drivers who illegally solicit passengers outside train stations, hotels and Colman Dock.

Still, some lawmakers are hesitant to back the legislation after hearing from independent town car drivers who complain the law would unfairly discriminate against them.

State law restricts town cars and limousines to prearranged trips such as a ride to the prom. But many rogue operators pick up cab fares on the street, offering trips to Sea-Tac Airport or elsewhere for the same or cheaper prices than taxis. On Wednesday, Seattle taxi drivers plan to rally at 10 a.m. outside the state Capitol.

In 2007, the *Seattle Post-Intelligencer* reviewed state and local records and found alarming instances in which town car drivers flouted the law. In one case, a registered sex offender who failed taxi licensing requirements due to his history was driving a town car and picking up customers at Colman Dock. In another case, a driver held a California woman against her will after he pretended to work for a limousine company she'd hired to take her from Seattle-Tacoma International Airport.

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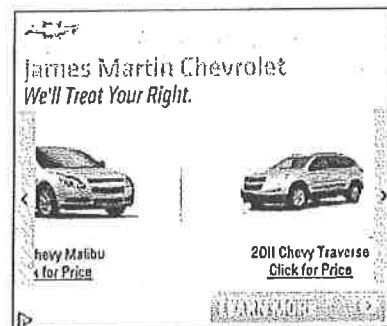
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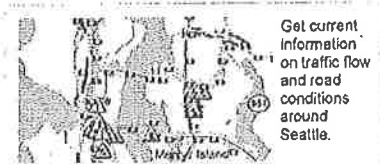
Redmond to Seattle

520 15 min (No delay)

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Seattle traffic map



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City officials estimate that up to 20 percent of for-hire town cars operating in Seattle aren't insured.

Most limo operators follow the rules, industry representatives say. But the executive sedan law, as it is currently written, largely relies on companies to self-regulate. License holders certify that their drivers meet qualifications and pass criminal history checks. But 70 percent of the industry is made up of independent, single-vehicle owners, who, under current law, essentially police themselves.

The state, unlike the city's taxi enforcement office, doesn't have enough employees to regularly audit license holders. Enforcement operations happen once or twice a year, and investigations must go through a slow administrative process. Seattle has most of the state's limo and town car businesses with no power to regulate.

Independent operators, however, see the legislation as a tool backed by larger limo companies and taxi drivers to push out competition from smaller businesses. They claim the legislation, which would impose higher licensing fees and closer scrutiny, unfairly discriminates against an industry that is dominated by disadvantaged immigrants trying to start better lives or who can't afford to break into the taxi business. Both industries are dominated by immigrants from India and East Africa.

Alexander Samuel, of the Seattle Independent Limo Driver Association, said rogue operators should be stopped. But he told state lawmakers the new regulations would be unfair to legitimate drivers.

"We are the victim also," he said.

City officials, however, say there is a subset of independent town car operators who enter the industry simply because they can't meet the city's strict background standards and insurance requirements to drive taxis, which puts consumer safety at risk. Cab drivers, for instance, pay \$1,050 per year to get their taxis licensed and inspected. Town car drivers pay the state no more than \$90 for their licenses under current law.

Under the legislation, the fee for limousine and town car vehicle certificates would rise to \$75 annually. In addition, the price for a chauffeur's license, which also is required, would increase to \$350 in 2011. The fees would generate about \$788,000 in the next two years -- about \$160,000 of which would help pay for Seattle's costs in hiring an additional taxi inspector and part-time administrator. It also would require town car drivers to maintain records on trips and customers, as well as other requirements that taxis must meet.

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